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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RYAN BUNDY, individually; et al.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No.:2:23-cv-01724-RFB-MDC

**STIPULATION FOR EXTENSION OF
TIME TO OPPOSE DEFENDANT'S
SECOND MOTION TO DISMISS (1st
request)**

IT IS HEREBY STIPULATED by and between Plaintiffs, RYAN BUNDY, et al. (collectively referred to herein as "Plaintiffs"), by and through their attorney of record, BRET O. WHIPPLE, ESQ., of the JUSTICE LAW CENTER, and Defendant, UNITED STATES OF AMERICA, by and through its counsel, JEVECHIUS BERNARDONI, ESQ., Assistant United States Attorney, that Plaintiffs will have an extension of 3 weeks, with a deadline of no later than June 6, 2024, in which to file a Opposition to Defendant's Second Motion to Dismiss. In addition, with this extension, the Government's Reply would normally be due on June 13, 2025. However, Defendant's Government's attorney is out of town through the middle of June. Accordingly, the Government will have an extension of 2 weeks, with a deadline of no later than June 27, 2025, in which to file any Reply that it may wish to file. This is the First Request for an Extension of Time to file the Opposition and Reply and is based on the fact that Plaintiff's counsel was involved in several trials and evidentiary hearings in the last three (3) weeks and needs additional time to finalize his Opposition, along with the fact that Defendant's attorney will

1 be out of town and will need additional time to file his Reply to Plaintiff's Opposition.

2 DATED on this 16th day of May, 2025.

3 **JUSTICE LAW CENTER**

ISMAIL J RAMSEY
UNITED STATES ATTORNEY

4
5 /s/ Bret O. Whipple

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10 Attorney for Plaintiffs

/s/ Jevechius Bernardoni

JEVECHIUS BERNARDONI, ESQ.

Special Assistant US Attorney, Acting Under

Authority Conferred by 28 U.S.C. §515

Attorneys for the United States of America

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ORDER

Pursuant to the Stipulation and good cause appearing,

IT IS ORDERED that Plaintiff's counsel shall have an extension of 3 weeks, with a deadline of no later than June 6, 2025, in which to file his Opposition to Defendant's Second Motion to Dismiss;

IT IS FURTHER ORDERED that Defendant's counsel shall have an extension of 2 weeks from when its' reply would normally have been due, with a deadline of no later than June 27, 2025, in which to file any Reply to Plaintiff's Opposition.

DATED on this ____ day of May, 2025.

United States District Court Judge